

Public Comments on Whole Body Contact Recreation Use
and Department Recommendation for Use Designation

WBID 0132 Coon Creek

Missouri Department of Natural Resources
Water Protection Program

Coon Creek

NEWMAN, COMLEY & RUTH

Professional Corporation
Attorneys and Counselors at Law
601 Monroe Street, Suite 301
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Jefferson City, Missouri 65102
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RECEIVED

Brundage, Robert
1 of 2

2005 NOV 28 PM 12:26

WATER PROTECTION PROGRAM

Date: November 28, 2005

Time: 10:00 am

Attention: Ms. Stacia Bax

Company: Missouri Department of Natural Resources

Facsimile: 526-1146

From: Robert J. Brundage

Total number of pages transmitted (including this cover page):

4

COMMENTS:

Please see the attached.

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ALICIA EMBLEY TURNER

November 28, 2005

Ms. Stacia Bax
Use Attainability Analysis Coordinator
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Re: Removal of WBCR designation on Coon Creek (WBID #132), Randolph County

Dear Ms. Bax:

I am writing the Missouri Department of Natural Resources' Water Protection Program ("Department") and Missouri Clean Water Commission ("Commission") on behalf of my client, the City of Moberly. The City of Moberly hereby submits the following comments in support of the Commission's decision to not assign the beneficial use of "whole body contact recreation" ("WBCR") to Coon Creek, WBID#132, located in Randolph County, Missouri.

The original Use Attainability Analysis ("UAA") submitted by the City of Moberly was based on the conditions at three different sites within Coon Creek, as well as the interviews of about six different landowners who currently own property abutting the creek. After the Department's Internal Review Committee ("Committee") made its recommendation, and within the comment period, the City of Moberly submitted additional information to be considered by the Department and the Commission. This additional information was based on an evaluation of four new sites and the interviews of several more landowners who currently own property along the creek. Depth data was obtained on only one of these additional sites, however, because of the difficulty in accessing the stream. Although pools at these sites may occasionally meet the Department's depth guidelines for WBCR, these portions of the stream are inaccessible from land because of heavy brush and high, steep banks, and they are also inaccessible from within the stream itself because of the numerous obstacles, such as beaver dams and fallen trees, encountered along the entire length of the creek. For the record, the City of Moberly hereby incorporates by reference both its original UAA and the additional information it submitted on or about August 18, 2005.

EPA regulations permit states to "remove a designated use which is not an existing use... if the State can demonstrate that attaining the designated use is not feasible because: . . .

Brundage, Robert
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Ms. Stacia Bax
November 28, 2005
Page 2 of 3

[n]atural, ephemeral, intermittent, or low flow conditions or water levels prevent the attainment of the use..." See 40 C.F.R. § 131.10(g)(2). The Department has issued guidelines on when the WBCR use is not feasible based on low-flow conditions: "[i]n order to support whole body contact recreation, a maximum depth of at least one (1.0) meter (3.28 feet) in the deepest pool or an average depth of at least one-half (0.5) meter (1.64 feet) must be maintained during base flow conditions..." See Recreational Use Attainability Analysis Protocol, p. 11 (Nov. 3, 2004).

After reviewing the original UAA, and without the benefit of the additional information submitted later by the City of Moberly, the Committee recommended that the use of WBCR be retained on Coon Creek. The Committee gave two reasons for recommending that the WBCR use designation be retained: (1) one of the sites evaluated met the Department's average depth guideline of 1.64 feet and (2) "one landowner indicated that the stream along his property has a maximum depth of 3 feet during base flow."

The first reason given by the Committee—the average-depth at one site—just barely meets the Department's depth guidelines. The average depth at this single site was only 1.66 feet, which exceeded the guideline by only .02 feet. This is less than ¼ of an inch. This measurement might have varied by ¼ of an inch if, for instance, the measuring device had landed on a pebble or was allowed to settle into sediment on the bottom of the stream. Additionally, the City of Moberly's calculations, which were based on numbers from the first three sites in the original UAA, indicate that the average depth observed throughout these portions of Coon Creek is just 1.25 feet, with an average maximum depth of just 1.66 feet.

The Committee's other reason—the landowner's comment—simply does not support a WBCR designation. The landowner stated that the maximum depth of the stream during base-flow conditions was approximately three feet, which is less than the Department's own maximum-depth guideline of 3.28 feet. Thus, it is clear that a WBCR designation is not appropriate on this basis.

The Commission, which had the benefit of the additional information submitted by the City of Moberly, properly decided that the WBCR use designation is inappropriate for Coon Creek. There are several good reasons why this was the right decision.

First, as the Committee noted, there is no evidence of anyone swimming in Coon Creek either now or in the past. No WBCR uses were observed by Geri Blakey, the Water Quality Coordinator for the City of Moberly, in conducting the Use Attainability Analysis. More importantly, the creek flows through private property, and none of the numerous landowners who were interviewed indicated that they had engaged in WBCR activities in the creek or knew about anyone else doing so. Further, Ms. Blakey observed no evidence of any rope swings, paths, diving platforms, or campfires along the creek.

Second, Coon Creek is generally much too shallow to support WBCR activities. The City of Moberly provided direct evidence of this in its original UAA, which shows only one location where the water depth met the Department's average-depth guidelines by a miniscule

Ms. Stacia Bax
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amount. No accessible sites were deep enough to meet the Department's maximum-depth guideline for WBCR. As the additional information demonstrates, certain portions of the stream might occasionally meet the Department's maximum-depth guideline, but those areas are essentially inaccessible during the summer because of the height of the stream bank (often at least six feet high), the steepness of the slopes, the dense surrounding vegetation, and the numerous obstacles across the creek.

Third, the Department's WBCR depth guidelines are just that—non-binding guidelines that are not mandated by any statute or regulation. Isolated, minor instances where these depth guidelines are occasionally exceeded should not take precedence over numerous other depth measurements that fall well below the guidelines. The Commission properly utilized both the information before it as well as good common sense in concluding that low water levels and inaccessibility prevent people from engaging in WBCR activities in Coon Creek.

Thank you for the opportunity to submit these comments in support of the Commission's decision that WBCR uses are not attainable in Coon Creek.

Sincerely,

NEWMAN, COMLEY & RUTH P.C.

By:


Robert J. Brundage
rbrundage@ncrpc.com

RJB:clv

cc: Mary West, City of Moberly
Jon Bergenthal, Jacobs Civil, Inc.

Coon Creek

» Mississippi River and Coon Creek - Stacia Bax/WPCP/DEQ/MODNR

DiStefano, Cindy
log 2 J



"Cindy DiStefano"
<Cindy.DiStefano@mdc.mo.gov>

11/28/2005 11:38 AM

To stacia.bax@dnr.mo.gov

cc

bcc

Subject Mississippi River and Coon Creek

Please see attached. Hard copies will follow by mail.

Cindy

Cindy DiStefano
Resource Scientist - Environmental Services
Missouri Department of Conservation
1110 S. College Ave.
Columbia, MO 65201
(573) 882-9909 x3297
FAX - (573) 882-4517
Cindy.DiStefano@mdc.mo.gov



Mississippi River UAA Stacia.doc Coon Creek UAA Stacia.doc

DiStefano, Cindy
2 of 2

REPLY TO: Resource Science Center
1110 S. College Ave.
Columbia, MO 65201
Telephone: 573-882-9880
Fax: 573-882-4517

November 28, 2005

Ms. Stacia Bax
Use Attainability Analysis Coordinator
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Ms. Bax,

Subject: Use of Coon Creek for Swimming or Other Whole Body Recreation

The Missouri Department of Conservation (Department) appreciates the opportunity to provide comments on the proposed designated use change for Coon Creek in Randolph and Monroe counties. The "fishable/swimmable" goal of the Clean Water Act is intended to allow Missouri citizens the opportunity to enjoy the resources of the state, including the opportunity to safely recreate in its waters. The Department fully supports the attainment of the water quality standards necessary to meet the goals of the Clean Water Act in the State of Missouri and encourages citizens to better understand and appreciate aquatic systems and the life that lives in them.

Department staff have visited with landowners along Coon Creek to inquire about use of the creek that crossed their property. Mr. Todd stated that he takes his grandchildren to the creek to play. He has a small sandbar on his property where the children like to play and splash in the water. The children were too young to swim this summer.

Dr. Afrassiab stated that her children waded in the creek waist deep looking for crayfish. She also stated that there are holes deep enough to swim on their property.

Several landowners stated that they previously swam and fished in the creek, but no longer participate in those activities in Coon Creek due to pollution from the prison facility.

Ms. Stacia Bax
Page 2
November 28, 2005

The Department looks forward to continuing its partnership with MDNR on better protecting and conserving Missouri's lakes, rivers and streams. Please feel free to contact me at (573) 882-9909 extension 3297, if you have specific questions or would like further information.

Sincerely,

Cindy DiStefano
Resource Scientist

Coon Creek

Re: Comments on proposed exemption of Coon Creek - Stacia Bax/WPCP/DEQ/MODNR

Holman, Dean



"Dean Holman"
<DHolman@ShelterInsurance
.com>

10/28/2005 07:01 AM

To "Stacia Bax" <stacia.bax@dnr.mo.gov>

cc

bcc

Subject Re: Comments on proposed exemption of Coon Creek

Good morning Stacia,

Thank you for your suggestions.

The activities I mentioned in my previous note, that I can attest to, take place from the bridge on Randolph County road 2380, east along the creek for approximately 1/2 mile. The fishing activity occurs any time during the year as long as the water is not frozen over. The hunting and trapping activity occurs mostly during the months of April-May and again from October through February.

I would be interested in more information about the committee meeting and its results.

I hope this information is what you need. If I can do anything else, please let me know.

Thank you for your assistance.

Dean Holman
Shelter Insurance
573-214-4220
dholman@shelterinsurance.com

"Stacia Bax" <stacia.bax@dnr.mo.gov>

10/27/2005 03:22 PM

To "Dean Holman" <DHolman@ShelterInsurance.com>

cc

Subject Re: Comments on proposed exemption of Coon Creek

Hi Mr. Holman,
Thank you for you comments.

I was wondering if you could more specifically tell me the locations of recreational activities in the water (e.g., where you or others fish, trap, swim, etc.) An example could be, "I have seen people fish from the Hwy. XYZ bridge every year from May to November." The more specific the better.

The comments you made below will be added to the other comments we will receive. They will be presented to the Missouri Clean Water Commission at their meeting in January 2006. If you would like more specifics about the meeting and its results, just let me know. We will also be submitting all comments received to the U.S. Environmental Protection Agency for their consideration.

As more citizens, like yourself, tell us their comments, the better we can manage the water resources of the state.

Thanks again.

Stacia Bax

Environmental Specialist

MDNR, Water Quality Monitoring & Assessment Section

573-526-7838

"Dean Holman" <DHolman@ShelterInsurance.com>

To stacia.bax@dnr.mo.gov

10/27/2005 07:51 AM

cc

Subject Comments on proposed exemption of Coon Creek

Good morning,

I own 300 acres that are bisected by Coon Creek east of Moberly in Randolph County. I understand there is a motion by the Missouri Clean Water Commission to exempt the creek from anti-pollution rules long overdue in our state. I feel this is the wrong course of action.

My sons and I hunt and hike along the creek, as do several of my friends and neighbors. Some of my neighbors have also asked my permission to trap along the creek. The property adjacent to mine was purchased by some gentlemen for hunting and recreation purposes. The creek bisects their property as well. I have fished in Coon Creek, but have not kept any fish for consumption because of health risks. On several occasions, I have seen people fishing the creek from the bridge adjoining my property.

The creek in our neighborhood runs through an area bordered by steep wooded hillsides and bottomland fields. It has several pools that contain water throughout the year, and attracts waterfowl, beavers, otters, and other assorted wildlife. It is a beautiful area. While I realize it might incur some cost to the City of Moberly to disinfect the sewage effluent that is released into the creek, I am strongly opposed to exempting the creek from the anti-pollution rules. If we have the ability to clean it up, we should take the opportunity to do so. The least expensive course of action is not always the right course of action.

Thanks for your consideration.

Dean Holman

573-214-4220

dholman@shelterinsurance.com

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STACIA BAX

11-10-2005

Johnson, Larry
182

USE ATTAINABILITY ANALYSIS COORDINATOR
P.O. BOX 176

JEFFERSON CITY MO 65102-0176

GREETINGS,

IM WRITING ABOUT THE PROPOSED EXEMPTION OF
COON CREEK FROM ANTIPOLLUTION RULES.

COMMENTS ABOUT STREAM USE SHOULD INCLUDE
ELK FORK ALL THE WAY TO MARK TWAIN LAKE BECAUSE
WATER DISCHARGED BY THE MOBERLY FILTER PLANT IS
USUALLY THE ONLY FLOW ALL THE WAY TO THE LAKE.
ELK FORK ABOVE THE COON CREEK INTERSECTION IS
SIMILAR TO COON CREEK IN LENGTH. USUALLY THERE IS
NO WATER FLOW FROM UPPER ELK FORK, MILLIGAN CREEK,
OR BEE CREEK WHICH WOULD DILUTE THIS WATER FROM
THE FILTER PLANT. SEVERAL YEARS AGO THERE WAS ALGAE
SLIME AT THE LOW-WATER CROSSING AT THE UNION
COVERED BRIDGE STATE HISTORICAL SITE. THERE WAS
GREEN SLIME ALL THE WAY UPSTREAM ELK FORK
UNTIL COON CREEK AND THE SLIME WAS OBSERVED IN
COON CREEK BELOW THE FILTER PLANT. ELK FORK UPSTREAM
OF THE COON CREEK INTERSECTION, MILLIGAN CREEK HAD
NO GREEN SLIME.

IN THE FALL THE STAGNANT WATER OF BEE CREEK, MILLIGAN
CREEK, AND ELK FORK UPSTREAM OF THE COON CREEK INTERSECTION
TURNS BLACK FROM THE FALLEN LEAVES, WHILE COON CREEK
AND DOWNSTREAM ELK FORK APPEARS CLEAR BECAUSE OF
THE FLOW FROM THE FILTER PLANT.

THE PUBLIC COULD WADE WHERE WATER FLOWS OVER
THE LOW-WATER CROSSING AT THE UNION COVERED BRIDGE,
AND DOWNSTREAM FROM THE BEE CREEK INTERSECTION
IS A FISHING AREA OPEN TO THE PUBLIC AND THERE COULD
BE WADING AND SWIMMING THERE. WHEN I LEARNED TO
SWIM, I USED A YARD DEEP FARM POND. I COULD HAVE USED
ELK FORK BUT IT HAD A REPUTATION OF BEING UNCLEAN
FROM MOBERLY'S DISCHARGE. COON CREEK IS DEEP ENOUGH TO
PADDLE AROUND IN FOR A BEGINNING SWIMMER.

C.C.

SIERRA CLUB
MONROE COUNTY COMMISSIONERS
REP. WES SHOEMEYER

SINCERELY,

Larry Johnson
LARRY JOHNSTON
16120 MONROE ROAD 1043
MADISON, MO 65262-7120

Y R-I

3707041706
JOHNSTON HAZEL V
16120 MONROE ROAD 1043
MADISON
NO 35263-2120

30 MAR-001

32

Cents

and Evening Democrat



SPORTS

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Page 7



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Coon Creek exempted from new state anti-pollution rules

Coon Creek, just east of Moberly, will be exempted from new statewide anti-pollution rules according to a recent decision by the Missouri Clean Water Commission. The U.S. Environmental Protection Agency must still approve the decision, however. The public will be able to offer comments about their use of the stream through Nov. 28, 2005.

The new water quality rules, which resulted from a lawsuit brought in 2003 by the Missouri Coalition for the Environment, finally bring Missouri at least partly in compliance with federal Clean Water Act provisions that state that all streams, lakes and rivers should be safe for swimming and fishing. The rules require that sewage treatment facilities disinfect wastewater before discharging it into waterways. If Coon Creek is exempted, sewer agencies and other facilities will be allowed to continue releasing bacteria-laden water into it.

Sewage that has not been disinfected may contain viruses, parasites and other pathogens that can make people sick with ear infections, typhoid fever, hepatitis, gastroenteritis, dysentery, and other illnesses. High levels of fecal coliform and E. coli bacteria are indicators

of poor water quality and contamination with human waste. Waters with elevated levels of fecal coliform and E. coli bacteria are not safe to swim in or for children to play in.

Nearly 140 streams were exempted by the Clean Water Commission from the new rules in September, following a 30-day public comment period, on the grounds that they were not used for swimming or were too shallow to allow swimming. At the last minute, and against the recommendation of the Missouri Department of Natural Resources, the Commission added Coon Creek, the Mississippi River (between St. Louis and the Ohio River) and River des Peres and Maline Creek in St. Louis to the list of exempted streams — without having given the public the opportunity to comment, as required by the Clean Water Act. Belatedly, the Commission has now set a public comment period on the streams that will be open until November 28, 2005.

Anyone who has used Coon Creek, the Mississippi River, River des Peres or Maline Creek may want to provide comments. If people have used them at any time since 1975 for swimming or

other activities where they could get water in their eyes, ears, or mouth, full water-quality protections must be put in place and sewer agencies required to disinfect the wastewater they discharge. Comments should be as informative as possible about exactly how, when and where the stream is used. They should also include similar information about any other uses, such as wading, boating or fishing, since these also expose people to bacteria and viruses and should require some level of protection.

Additional information about the streams recommended for exemptions can be found at MDNR's website (http://dnr.missouri.gov/wpscd/wpcp/wqstandards/uaa/uaa_county.htm) by clicking on Randolph, St. Louis, and any of the counties along the affected stretch of the Mississippi River.

Anyone who is interested in protecting the above streams should send their comments to: Stacia Bax, Use Attainability Analysis Coordinator, P.O. Box 176, Jefferson City, Mo. 65102-0176. Your comments can also be emailed to stacia.bax@dnr.mo.gov. Mailed comments should be postmarked and e-mailed comments received by 5 p.m. on Nov. 28.

Domestic Violence Awareness Month observed at Safe Passage

Johnson, Larry
282

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Jacobs Civil Inc.
501 North Broadway
St. Louis, Missouri 63102 U.S.A.
1.314.335.4000

RECEIVED
2005 SEP -1 PM 12:18
WATER PROTECTION PROGRAM

August 29, 2005

Mr. Phillip Schroeder
Water Protection Program
Missouri Department of Natural Resources
P O Box 176
Jefferson City, Mo. 65102

Subject: UAA Committee Review Determination on Coon Creek — Randolph County

Dear Mr. Schroeder:

Jacobs Civil Inc, in cooperation with the City of Moberly, conducted a Use Attainability Assessment on Coon Creek in Randolph County downstream of the City's wastewater treatment facility. We concluded that Coon Creek does not support an attainable Whole Body Contact Recreation use based on the criteria in the MDNR UAA protocol (8/29/04) of natural, ephemeral, intermittent or low flow conditions, specifically:

- The average depth of a water body is less than 1.64 feet over **50% of all** the water surveyed from an observation point; or
- The maximum depth is 3.28 feet in the deepest pool

The DNR review committee recommended to retain use based upon one of six locations where the measured average depth was 1.66 feet deep exceeding the guidance average of 1.64 by 0.02 feet or .25 inch. The second reason noted was a reference by an interviewed property owner that the creek had a **maximum depth** of 3 feet during base flow, which is less than the maximum criteria defined in the MDNR protocol of 3.28 feet by 3.36 inches.

City staff went back to the various sites to take additional measurements and validate the data collected 2 months ago. The difference of .25 inch could easily be the difference of setting on a pebble that will move with the next rain, or letting the measurement tape settle into the bottom sediment. The summer vegetation of thick brush and briars and the high steep slopes made access extremely difficult, which supports the comments by the land owners that there are no WBCR activities along this part of the creek.

We request that the committee reconsider the determination and modify its recommendation based upon the above-noted deviations by the internal review committee from the September 29, 2004 MDNR protocol and the facts listed below:

- No WBCR activities were observed during the survey
- None of the property owners interviewed (over 3 miles of stream) use or know of anyone using the stream for WBCR activities
- Pools at road crossings are potentially influenced by a "scour" due to the culvert restriction that create deeper-than-typical pools in those areas
- Follow-up field verification by City staff was extremely difficult due to dense brush/briars and the 10-15 foot high steep creek banks that made access very hazardous.

Considering the physical constraints to accessing the creek, the stated uses by the property owners, and the fact that the originally-submitted data supports a recommendation to remove the designated use, the City of Moberly requests that MDNR reconsider the recommendation or grant the opportunity to meet and understand the basis for the determination.

Please advise as to any other remedies the City may have if reconsideration is denied. We shall make representatives available at your convenience to discuss our position and provide additional detail if reasonable. Thank you for your consideration.

Respectfully,



Thomas B. Jones, P.E.
Senior Project Manager
Jacobs Civil Inc

Coon Creek

Marino, Julie

CARE
Citizens Against River Exemption
11141 Glacier Drive
St. Louis, MO 63146

EXEMPTION REQUEST

NOV 21 6:11:58

11/21/05

November 18, 2005

The Honorable Stacia Bax
Use Attainability Analysis Coordinator
P. O. Box 176
Jefferson City, MO 65102

Dear Ms. Bax:

We are Citizens Against River Exemption (CARE), a group of Missourians that fights for the sanitation of our rivers. We are troubled by the decision of the Clean Water Commission (CWC) to exempt one hundred and forty two rivers from the new water quality rules. These rules, established by the Clean Water Act, involve disinfecting sewage before it comes in contact with these bodies of water. This preventative measure helps keep rivers pathogen-free for the safety of the public. However, rivers such as the Mississippi River, River des Peres, Maline Creek, and Coon Creek will be officially excluded from this safety precaution if the Environmental Protection Agency confirms the CWC's decision. Our purpose as an organization is to persuade elected officials to have these exceptions removed from the Clean Water Act.

We are writing you to ask for your support in CARE's fight for sanitary rivers. The people involved in this organization care about the citizens who will be affected by this legislation. As members, we believe that if the Environmental Protection Agency passes this exemption request, it will be due to poor judgement. Allowing waste to run into our rivers could have detrimental effects. Sewage can carry the bacteria known as Escherichia coli, or E. Coli, which has the potential to infect anyone who comes in contact with the contaminated water. Besmirched water may also carry other harmful bacteria, as well as parasites. Incorporating all rivers under the Clean Water Act's updated water quality rules will prevent civilians from experiencing preventable illnesses.

We hope you understand our concerns. We urge you to use your influence to persuade the EPA to avoid exemptions of these rivers. Your support would be greatly appreciated. Please contact us with your opinions on the matter.

Sincerely,

Julie Marino

Julie Marino
President of CARE

CARE

11141 Gilcrest Dr.

St. Louis, MO 63146

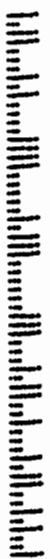
SAINT LOUIS MO 631

19 NOV 05 PM 07 L



The Honorable Stella Bax
Use Attainability Analysis Coordinator
P.O. Box 176
Jefferson City, MO 65102

65102-0176



Coon Creek

Protection for Mississippi, River des Peres, Maline Creek, Coon Creek - Stacia Bax/WPCP/DEQ/MODNR

Meyer, John



Jjsmlem@aol.com
11/27/2005 06:49 PM

To stacia.bax@dnr.mo.gov
cc
bcc
Subject Protection for Mississippi, River des Peres, Maline Creek,
Coon Creek

Dear Ms. Bax:

I am a voting citizen of Missouri who favors maintaining the highest water standards for all of our rivers, creeks and watersheds.

Today's waste disposal technology permits the highest standards of pollution control. We should uphold high standards for all sites.

The Mississippi, River des Peres, Maline and Coon Creeks are most important to maintain for recreation because they are close to major population centers. Time and travel cost constraints make them highly desirable for recreational use. They will be used if they are kept clean.

Sincerely yours,

John S. Meyer, MD

Coon Creek

William Reeves, Ph.D.
238 West Glendale Road
Webster Groves, MO 63119

Wm. Reeves
183

November 15, 2005

Stacia Bax
Use Attainability Analysis Coordinator
P.O. Box 176
Jefferson City, MO 65102-0176

RE: Comments on Clean Water Commission Actions for Four Missouri Waters

Dear Ms. Bax:

I am writing the Missouri Department of Natural Resources' Water Protection Program and Missouri Clean Water Commission as a native Missourian who is concerned with preserving this State's natural resources. I hereby submit my comments on the Clean Water Commission's action to exempt the Mississippi River, the River Des Peres, Maline Creek and Coon Creek from Whole Body Contact Recreation (WBCR) designations.

I have over a decade's experience in water quality and environmental science. After earning my Ph.D. in toxicology I was employed by the California State Water Resources Control Board. While with the Board I was responsible for overseeing UAA development and approval, developing water quality standards, reviewing National Pollutant Discharge Elimination System permits, and chairing the Board's Effluent Dominated Waterways work group. Since 2004 I have worked for a local consulting firm conducting risk assessments and evaluating the human health impacts of contaminated water supplies.

WBID 1707, Mississippi River, St. Louis City and County, UAA 0301: The Internal Review Committee (IRC) correctly concluded that the UAA for the Mississippi River failed to demonstrate a lack of WBCR under any of the three factors considered. Nevertheless, the Clean Water Commission chose to ignore its own staff and find the opposite was true. One piece of evidence the Commission seems to have relied on was an assertion by the Metropolitan St. Louis Sewer District claiming that channel velocities in the St. Louis area do not permit WBCR. In fact, Martin Strel, a marathon swimmer, completed a journey from the headwaters to New Orleans in 2002. (http://www.siol.net/dogodki/martinstrel/lang_context.asp?page_id=1320) Mr. Strel is not alone. Other marathon swimmers have made similar journeys in various forms over the years. The US Army Corps of Engineers actually includes the topic of swimming the length of the Mississippi River in the Frequently Asked Questions section of its web site. Water skiing is also common in the Mississippi near St. Louis. The Commission also received



"Bill Reeves"
<wr_reeves@yahoo.com>
11/14/2005 08:28 PM

To stacia.bax@dnr.mo.gov
cc
bcc
Subject Comments on Mississippi River, River Des Peres, Maline
Creek and Coon Creek

Yahoo! FareChase: Search multiple travel sites in one click.



<http://farechase.yahoo.com> Reeves_November 2005 MoDNR UAA Comment Letter.doc

Reeves, Wm 383



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- Achievements
- Strel's Guinness records
- Laureus World Sports Awards
- The book "Martin Strel on the Mississippi"
- Pressroom
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- Mailing list
- Guestbook

Contact

Mob: +386 31 648 750
Tel: +386 4 279 1900
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info@martinstrel.com

9/29/2003, 08:06 a.m.

Martin's Book

The date is September 9, the time 11:35 a.m. Slovene ultramarathon swimmer Martin Strel touches a huge white sign where the Mississippi River meets the Gulf of Mexico; it reads 0 - zero miles.

With this action Strel kept his promise and ended his mission which took no less than 68 days. Day after day and week after week he had been swimming the mightiest river of them all without a day's rest. On September 9, 2002, he managed to conquer it and by doing so fulfilled his mission. He honored the 10-year anniversary of the United States' recognition of Slovenia as an independent country and paid tribute to the memory of the innocent victims of the terrorist attacks on September 11. He later took part in the ceremony in front of the United Nations Headquarters commemorating the 1-year anniversary of the attacks. As well as swimming for clean waters all over the world, he was also increasing awareness for the preservation of the environment.



The book is a 216 pages systematic and chronological account of Martin's feat. It is written as a day-to-day diary with a mention of all the important events in and along the river, shedding light on Strel's thoughts and the biographical data of the man who was the first to swim the Mississippi in its entire length (2360 miles) and set a new world record in long distance marathon swimming.

The book also includes various statements and acknowledgements of the eminent people from Slovenia and abroad as well as an introduction by Jelko Kacin, President of the Organizing Committee. Each stage of the journey is accompanied by photographs, which enhance the text and add to its interest. The book **MARTIN STREL IN THE MISSISSIPPI** is available in both

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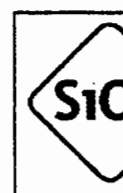


MARTIN
STREL

WWW.MARTINSTREL.COM

June 17 - June

- The book "Martin Strel on the Mississippi"
- Martin's Book



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